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IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MARYLAND

UNITED STATES OF AMERICA

v.

JOHN WILLIAM MCMANUS JR.,

Defendant

CRIMINAL NO. 22-CR-00427 TDC

(Felon in Possession of Ammunition,  
18 U.S.C. § 922(g)(1); Illegal Possession  
of Machine Guns, 18 U.S.C. § 922(o);  
Forfeiture, 18 U.S.C. §§ 924(d), 21  
U.S.C. § 853(p), 28 U.S.C. § 2461(c))

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INDICTMENT

COUNT ONE

(Felon in Possession of Ammunition)

The Grand Jury for the District of Maryland charges that:

On or about May 9, 2022, in the District of Maryland, the defendant,

**JOHN WILLIAM MCMANUS JR.,**

knowing he had previously been convicted of a crime punishable by imprisonment for a term exceeding one year, knowingly possessed ammunition—that is, eleven rounds of 9mm ammunition—and the ammunition was in and affecting commerce.

18 U.S.C. § 922(g)(1)

**COUNT TWO**  
**(Illegal Possession of a Machine Gun)**

The Grand Jury for the District of Maryland further charges that:

On or about May 9, 2022, in the District of Maryland, the defendant,

**JOHN WILLIAM MCMANUS JR.,**

knowingly possessed a machine gun, as defined by Title 18, United States Code, Section 921(a)(23) and Title 26, United States Code, Section 5845(b), to wit, a loaded Polymer 80, 9mm semiautomatic pistol, model number PF940SC, bearing no serial number, modified with a machinegun conversion device with a selector switch.

18 U.S.C. § 922(o)

### **FORFEITURE ALLEGATION**

The Grand Jury for the District of Maryland further finds that:

1. Pursuant to Rule 32.2, Fed. R. Crim. P., notice is hereby given to the defendant that the United States will seek forfeiture as part of any sentence in accordance with 18 U.S.C. § 924(d), 21 U.S.C. § 853(p), and 28 U.S.C. § 2461(c), in the event of the defendant's conviction under Counts One and Two of this Indictment.

### **Firearms and Ammunition Forfeiture**

2. Upon conviction of the offenses set forth in Count One and Count Two of this Indictment, the defendant,

**JOHN WILLIAM MCMANUS JR.,**

shall forfeit to the United States, pursuant to 18 U.S.C. § 924(d) and 28 U.S.C. § 2461(c), any firearms and ammunition involved in the offense, including, but not limited to:

- a. a Polymer 80, 9mm semiautomatic pistol, model number PF940SC, bearing no serial number, modified with a machinegun conversion device with a selector switch seized on or about May 9, 2022; and
- b. approximately 11 rounds of 9mm ammunition contained therein.

**Substitute Assets**

3. If, as a result of any act or omission of any defendant, any of the property described above,

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third person;
- c. has been placed beyond the jurisdiction of the Court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be divided without difficulty,

the United States, pursuant to 21 U.S.C. § 853(p), as incorporated by 28 U.S.C. § 2461(c), shall be entitled to forfeiture of substitute property up to the value of the forfeitable property described above.

18 U.S.C. § 924(d)

21 U.S.C. § 853(p)

28 U.S.C. § 2461(c)

*Erek L Barron* <sup>SL</sup>

Erek L. Barron  
United States Attorney

A TRUE BILL:

**SIGNATURE REDACTED**

Foreperson

Date:

12/14/22